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9 Attorneys for Chad Carothers

10 UNITED STATES BANKRUPTCY COURT  
 11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 In re

13 PG&E Corporation,

14 and

15 PACIFIC GAS AND ELECTRIC  
 16 COMPANY,

17 Debtors.

18 ☐ Affects PG&E Corporation  
 19 ☐ Affects Pacific Gas and Electric Company  
 20 ☒ Affects both Debtors

21 \*All papers shall be filed in the Lead Case,  
 22 No. 19-30088-DM,

Case No. 19-30088-DM

Chapter 11  
 Lead Case, Jointly Administered

**DECLARATION OF RICHARD  
 FRANKEL IN SUPPORT OF MOTION  
 PURSUANT TO FED. R. BANKR. P.  
 9006(b)(1) TO ENLARGE THE TIME FOR  
 CHAD CAROTHERS TO FILE PROOF  
 OF CLAIM**

Date: August 4, 2020  
 Time: 10:00 a.m.  
 Crtrm.: Courtroom 17  
 450 Golden Gate Avenue  
 San Francisco, CA 94102  
 Judge: Hon. Dennis Montali

Objection deadline: July 28, 2020  
 4:00 p.m. (Pacific Time)

23 I, Richard Frankel, hereby declare as follows:

24 1. I am an attorney at law duly licensed to practice before the courts of the State of  
 25 Texas, and in numerous federal courts. I am a lawyer with Reiner, Slaughter & Frankel, LLP,  
 26 based in Redding, California.

27 2. My law firm represents wildfire victims who sustained losses from the Camp Fire  
 28 in 2018. My firm has timely filed over 800 Proof of Claim forms with Prime Clerk for losses  
 clients have suffered as a result of these fires.

3. Mr. Carothers contacted my office on or about July 1, 2020, once he heard that

PG&E had plead guilty to the cause of 84 deaths arising out of the Camp Fire.

4. The extended December 31, 2019 Claims Bar Date Deadline has passed.

5. As soon as I became aware that no proof of claim was filed for Mr. Carothers, and within one day, we filed his proof of claim (on July 2, 2020), and sought the assistance of local counsel to file this Motion.

6. I am over eighteen years of age, of sound mind, and fully-competent to make this declaration. All statements in this declaration are based on my own personal knowledge and observation and from my review of the court and business records in this case, or upon information and belief as indicated. If called to testify on this matter, I can and would competently testify to the matters set forth in this Declaration.

I declare under penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct.

Executed this 9th day of July, 2020, in Houston, Texas.

By:   
RICHARD FRANKEL